



Office of Temporary and Disability Assistance

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General Information System (GIS) Message

Section 1

Transmittal:	21 TA/DC023 Upstate and New York City
Date:	April 27, 2021
To:	Subscribers
Suggested Distribution:	Commissioners, SNAP Directors, TA Directors, Employment Coordinators
From:	Alison Maura, Director of Temporary Assistance & HEAP Employment and Income Support Programs
Subject:	Temporary Expansion of Student Eligibility Exemption Criteria as part of the federal Consolidated Appropriations Act of 2021
Effective Date:	Immediately
Contact Information:	SNAP Questions – SNAP Bureau (518) 473-1469 or otda.sm.cees.snap@otda.ny.gov

Section 2

The purpose of this General Information Systems (GIS) message is to provide social services districts (districts) with guidance regarding temporary policy changes to the Supplemental Nutrition Assistance Program (SNAP) college student eligibility rules. These temporary changes were enacted as part of the federal Consolidated Appropriations Act of 2021 (The Act).

The Act requires institutions of higher education to provide outreach to eligible students informing them that they could be eligible for SNAP due to the two temporary provisions. The United States Department of Education is also conducting outreach to potentially eligible students informing them about these temporary provisions and is directing them to contact their local SNAP office through the SNAP State Directory of Resources. For New York State, the resource provided is the Office of Temporary and Disability Assistance (OTDA) SNAP webpage (<https://otda.ny.gov/programs/snap/>). The OTDA SNAP webpage includes contact information for local departments of social services district offices. Due to this outreach, students and their families may begin contacting their district office for further information.

Student Eligibility

To participate in SNAP, a student enrolled at least half-time in an institution of higher education must meet just **one** of the several exemption criteria listed in federal regulations at 7 CFR 273.5(b).

The Act temporarily amends the student eligibility rules by adding the following two exemptions to the list of exemptions. Again, students need to meet only **one** of the exemption criteria:

1. The student is eligible to participate in a State or federally financed work study program during the regular school year, as determined by the institution of higher education. Previously, a student had to be actively participating in State or federal work-study, not just be eligible to participate, in order to be exempt from the work requirement.

Verification of eligibility to participate in a work study program may be found on the financial aid award letter provided to the student by the institution of higher education. If the student has misplaced or does not have access to the financial aid award letter, the student may request, in writing, that the institution of higher education provide a letter or otherwise communicate to the district verifying eligibility to participate in a work study program.

2. Any student whose family has an expected family contribution (EFC) of \$0 on their Free Application for Federal Student Aid (FAFSA) for the current academic year.

Verification of an expected family contribution (EFC) of \$0 may be found on a financial aid award letter or Student Aid Report (SAR). If the student has misplaced or does not have access to the financial aid award letter, the student may request, in writing, that the institution of higher education provide a letter or otherwise communicate to the State agency verifying an EFC of \$0. Note that the SAR does not display a dollar sign in front of the EFC figure. When a student's EFC is \$0, the SAR will show a string of zeros.

Individuals who meet the criteria to be considered an eligible student for SNAP must meet all other SNAP eligibility criteria.

Consistent with current requirements, districts must determine at certification and at recertification whether students meet the exemptions, including the new temporary exemptions, from the student eligibility restrictions. In addition, districts should examine a student's circumstances if any household reports a change during the certification period that would potentially add a new eligible member to the household (including under the new, temporary exemptions), as applicable.

Under the Consolidated Appropriations Act, 2021, the new, temporary student exemptions shall be in effect for initial SNAP applications until 30 days after the COVID-19 Federal public health emergency is lifted. The temporary student exemptions remain effective until the first recertification of a household beginning no earlier than 30 days after the COVID-19 public health emergency is lifted. (See Q&A link below.)

For additional resources on FAFSA data sharing, the Department of Education has provided the following resource: <https://studentprivacy.ed.gov/audience/school-officials-post-secondary>.

FNS has also provided a comprehensive Question and Answer policy document accessible here: <https://www.fns.usda.gov/snap/student-provisions-consolidated-appropriations-act-2021-qars>.

Federal guidance regarding the designation of USDA as an entity authorized for receipt of student financial data and contact information for the purposes of obtaining SNAP benefits can be found here: [Federal Student Aid - IFAP: 031921DesignofUSDOAFoodNutritionSrvcsSec483a3EofHEA](https://www.fns.usda.gov/snap/student-provisions-consolidated-appropriations-act-2021-qars).